

Comparison Chart Between Power Reactor CMs and Other Licensees ASMs

Section	Requirements of Power Reactor Order Rev. 1	Independent Spent Fuel Storage Installations	Decommission Reactors	Category I Fuel Cycle Facilities	Gaseous Diffusion Plants	Honeywell	Notes
A. Background.	Work schedules can challenge security force to perform duties.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
B. Scope.	Armed member of the security force, central alarm station operator, secondary alarm station operator, security shift supervisor, watchperson (i.e., watchman).	Armed member of the security force, alarm station operator, guard, security shift supervisor, watchperson (i.e., watchman) & any member responsible for executing the physical security plan. May elect to use power reactor Order to keep uniform set of requirements.	Armed member of the security force, central alarm station operator, guard, secondary alarm station operator, security shift supervisor, watchperson (i.e., watchman) & any member responsible for executing the physical security plan. May elect to use power reactor Order to keep uniform set of requirements.	Alarm station operator, armed member of the security force, guard, tactical response team member, watchperson (i.e., watchman) & any member responsible for executing the physical security plan.	Armed member of the security force, guard, security shift supervisor, watchperson (i.e., watchman) & any member responsible for executing the NRC physical security plan.	Armed member of the security force, guard, security shift supervisor, watchperson (i.e., watchman) & any member responsible for executing the physical security plan.	

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C.1(a)(1)(i). Individual Limit.	1-6 hours in any 24-hour period.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
C.1(a)(1)(ii). Individual Limit.	26 hours in any 48-hour period.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
C.1(a)(1)(iii). Individual Limit.	72 hours in any 7-day period.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
C.1(a)(2). Individual Limit: minimum break between work period.	10 hours; turnover permitted during the break period.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Same requirement, however, includes excluding up to 3 hrs/wk of off-duty physical fitness training during the break period. Personnel transitioning from DOE activities shall have at least a 48-hr break before performing the functions in B.	Requirements are the same as power reactors.	GDPs: excludes up to 3 hrs/wk of off-duty physical fitness training required by DOE.

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C.1(a)(3)(i). Individual Limit: Deviations.	Limited to circumstances that could not be foreseen or controlled.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
C.1(a)(3)(ii). Individual Limit: Deviations.	Security shift supervisor must determine deviation is required to maintain security.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Same requirement, however, General Manager, Plant or Assistant Plant Shift Superintendent authorizes deviation.	Requirements are the same as power reactors.	
C.1(a)(3)(iii). Individual Limit: Deviations.	Evaluation performed by trained individual (symptoms, contributing factors & affects of fatigue) that individual's fitness for duty would not be affected by additional work period authorized.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	

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C.1(a)(3)(iv). Individual Limit: Deviations.	The basis for approval in items (i) through (iii) are documented.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
Note 1. Individual Limit: transition of crews between work shifts.	An 8-hour break may be authorized for scheduled transition of crews between work shifts.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Deleted Note 1 based on Honeywell's request & stating that this note will not be used by their facility.	
C.1(a)(4). Individual Limit.	N/A	700 hrs/qtr and 2600 hrs/yr or use Group Work-Hour Controls of C.2.	700 hrs/qtr and 2600 hrs/yr or use Group Work-Hour Controls of C.2.	700 hrs/qtr and 2600 hrs/yr or use Group Work-Hour Controls of C.2.	700 hrs/qtr and 2600 hrs/yr or use Group Work-Hour Controls of C.2.	700 hrs/qtr and 2600 hrs/yr or use Group Work-Hour Controls of C.2.	
C.1(a)(4)(a). Individual Limit: Unplanned Security Outage or Increase in Threat Condition (per NRC advisory).	N/A	No specific quarter or annual limits; for periods > 90 days, take action to limit hours worked with requirements of C.1(a)(4); the use of this limit shall not exceed 120 days.	No specific quarter or annual limits; for periods > 90 days, take action to limit hours worked with requirements of C.1(a)(4); the use of this limit shall not exceed 120 days.	No specific quarter or annual limits; for periods > 90 days, take action to limit hours worked with requirements of C.1(a)(4); the use of this limit shall not exceed 120 days.	No specific quarter or annual limits; for periods > 90 days, take action to limit hours worked with requirements of C.1(a)(4); the use of this limit shall not exceed 120 days.	No specific quarter or annual limits; for periods > 90 days, take action to limit hours worked with requirements of C.1(a)(4); the use of this limit shall not exceed 120 days.	GDPs: recognize NRC and DOE advisory systems.

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C.1(a) Note 2: Baseline Threat.	N/A	The baseline threat condition is least significant threat condition in effect in last 120 days.	The baseline threat condition is least significant threat condition in effect in last 120 days.	The baseline threat condition is least significant threat condition in effect in last 120 days.	The baseline threat condition is least significant threat condition in effect in last 120 days.	The baseline threat condition is least significant threat condition in effect in last 120 days.	This is Note 1 for Honeywell.
C.1(a) Note 3: Increase in Threat Condition.	N/A	Increase in threat condition then requirements of C.1(a)(4)(a) apply otherwise C.1(a)(4) requirements apply.	Increase in threat condition then requirements of C.1(a)(4)(a) apply otherwise C.1(a)(4) requirements apply.	Increase in threat condition then requirements of C.1(a)(4)(a) apply otherwise C.1(a)(4) requirements apply.	Increase in threat condition then requirements of C.1(a)(4)(a) apply otherwise C.1(a)(4) requirements apply.	Increase in threat condition then requirements of C.1(a)(4)(a) apply otherwise C.1(a)(4) requirements apply.	This is Note 2 for Honeywell.
C.1(a) Note 4: Increase in Threat Condition.	N/A	Multiple increase in threat while C.1(a)(4)(a) in effect, requirements of C.1(a)(4)(a)(2) reset with each increase.	Multiple increase in threat while C.1(a)(4)(a) in effect, requirements of C.1(a)(4)(a)(2) reset with each increase.	Multiple increase in threat while C.1(a)(4)(a) in effect, requirements of C.1(a)(4)(a)(2) reset with each increase.	Multiple increase in threat while C.1(a)(4)(a) in effect, requirements of C.1(a)(4)(a)(2) reset with each increase.	Multiple increase in threat while C.1(a)(4)(a) in effect, requirements of C.1(a)(4)(a)(2) reset with each increase.	This is Note 3 for Honeywell.

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C.1(a) Note 5: Decrease in Threat Condition.	N/A	If threat decreases, compare it to baseline to see if in a increased threat condition in which C.1(a)(4)(a) apply. If so, C.1(a)(4)(a)(2) shall be referenced to date when the threat condition was last entered as a result of the increase.	If threat decreases, compare it to baseline to see if in a increased threat condition in which C.1(a)(4)(a) apply. If so, C.1(a)(4)(a)(2) shall be referenced to date when the threat condition was last entered as a result of the increase.	If threat decreases, compare it to baseline to see if in a increased threat condition in which C.1(a)(4)(a) apply. If so, C.1(a)(4)(a)(2) shall be referenced to date when the threat condition was last entered as a result of the increase.	If threat decreases, compare it to baseline to see if in a increased threat condition in which C.1(a)(4)(a) apply. If so, C.1(a)(4)(a)(2) shall be referenced to date when the threat condition was last entered as a result of the increase.	If threat decreases, compare it to baseline to see if in a increased threat condition in which C.1(a)(4)(a) apply. If so, C.1(a)(4)(a)(2) shall be referenced to date when the threat condition was last entered as a result of the increase.	This is Note 4 for Honeywell.
C.1(a) Note 6: Baseline Threat Condition.	N/A	Licensee shall reference changes in threat conditions prior to issuance of these ASMs to determine baseline threat condition and if C.1(a)(4)(a) apply.	Licensee shall reference changes in threat conditions prior to issuance of these ASMs to determine baseline threat condition and if C.1(a)(4)(a) apply.	Licensee shall reference changes in threat conditions prior to issuance of these ASMs to determine baseline threat condition and if C.1(a)(4)(a) apply.	Certificate Holders shall reference changes in threat conditions prior to issuance of these ASMs to determine baseline threat condition and if C.1(a)(4)(a) apply.	Licensee shall reference changes in threat conditions prior to issuance of these ASMs to determine baseline threat condition and if C.1(a)(4)(a) apply.	This is Note 5 for Honeywell.

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C.1(b). Review Approved Deviations.	Number and duration of approved deviations reviewed by Security Manager and limited to extent practicable.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Same requirement, however, Senior Management personnel other than individual in C.1(a)(3)(ii) performs review.	Requirements are the same as power reactors.	
C.1(c). Monitor and Control Work Hours.	Monitor and control individual work hours to help ensure excessive work hours are not compromising alertness and performance.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	
C.2(a). Group Work Hours.	Workers identified in section B shall be controlled per the following group work-hour limits of this section.	Workers identified in section B shall be controlled per the following group work-hour limits of this section or per the individual work-hour controls of C.1(a)(4).	Workers identified in section B shall be controlled per the following group work-hour limits of this section or per the individual work-hour controls of C.1(a)(4).	Workers identified in section B shall be controlled per the following group work-hour limits of this section or per the individual work-hour controls of C.1(a)(4).	Workers identified in section B shall be controlled per the following group work-hour limits of this section or per the individual work-hour controls of C.1(a)(4).	Workers identified in section B shall be controlled per the following group work-hour limits of this section or per the individual work-hour controls of C.1(a)(4).	

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C.2(a). Group Work Hours: Normal Planned Conditions.	Shall not exceed 48 hrs/wk, excluding shift turnover, averaged over consecutive periods not to exceed 6 wks. Workers who did not work $\geq 75\%$ normally scheduled hours during averaging period shall not be included in calculating the average.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Same requirement, however, includes excluding up to 3 hrs/wk of off-duty physical fitness training.	Requirements are the same as power reactors.	GDPs: excludes up to 3 hrs/wk of off-duty physical fitness training required by DOE.

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C.2(b). Group Work Hours: Planned Security System Outages.	Shall not exceed 60 hrs/wk, excluding shift turnover, averaged over consecutive periods not to exceed 6 wks. Workers who did not work $\geq 75\%$ normally scheduled hours during averaging period shall not be included in calculating the average. For periods >90 days, take action to limit hours worked with requirements of C.2(a); the use of this limit shall not exceed 120 days.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Same requirement, however, includes excluding up to 3 hrs/wk of off-duty physical fitness training.	Requirements are the same as power reactors.	GDPs: excludes up to 3 hrs/wk of off-duty physical fitness training required by DOE.

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C.2(c). Group Work Hours: Unplanned Security Outages or Increase Threat Conditions (per NRC advisory).	No specific group limits for periods > 90 days, take action to limit hours worked with requirements of C.2(a); the use of this limit shall not exceed 120 days.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Same requirements, however, recognizes DOE advisory.	Requirements are the same as power reactors.	For GDPs: recognize NRC and DOE advisory systems.
C.2 Note 7: Baseline Threat	The baseline threat condition is least significant threat condition in effect in last 120 days.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	This is Note 3 for power reactors. This is Note 6 for Honeywell.
C.2 Note 8: Increase in Threat Condition.	Increase in threat condition then requirements of C.2(c) apply otherwise C.2(b) requirements apply using licensees original start date for the planned outage.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	This is Note 4 for power reactors. This is Note 7 for Honeywell.

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C.2 Note 9: Increase in Threat Condition.	Multiple increase in threat while C.2(c) in effect, requirements of C.2(c)(2) reset with each increase.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	This is Note 5 for power reactors. This is Note 8 for Honeywell.
C.2 Note 10: Decrease in Threat Condition.	If threat decreases, compare it to base line to see if in a increased threat condition in which C.2(c) apply. If so, C.2(c)(2) shall be referenced to the date when the threat condition was last entered as a result of the increase.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	This is Note 6 for power reactors. This is Note 9 for Honeywell.

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C.2 Note 11: Baseline Threat Condition.	Shall reference changes in threat conditions prior to issuance of these CMs to determine baseline threat condition and if C.2(c) apply.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	This is Note 7 for power reactors. This is Note 10 for Honeywell.
C.2(d): Exercises.	For Force on Force Exercises: Shall not exceed 60 hrs/wk, excluding shift turnover, during conduct of exercise.	N/A	N/A	Requirements are the same as power reactors.	Same requirements are applied to Arming and Arrest Authority Security Plan Exercises.	N/A	GDPs: The AAASP Exercises is required by DOE.
C.3: Declared Emergencies.	Licensees exempt during declared emergencies as defined by emergency plan.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	Requirements are the same as power reactors.	

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C.4: Procedures	Develop procedures describing: implementing work-hour controls, individuals reporting unfit for duty due to fatigue and document if self declarations of unfit for duty if individual is returned to work.	In addition to the requirements, the procedures must also specify if individual work-hour controls of C.1(a)(4) or group work-hour controls C.2 will be followed.	In addition to the requirements, the procedures must also specify if individual work-hour controls of C.1(a)(4) or group work-hour controls C.2 will be followed.	In addition to the requirements, the procedures must also specify if individual work-hour controls of C.1(a)(4) or group work-hour controls C.2 will be followed.	In addition to the requirements, the procedures must also specify if individual work-hour controls of C.1(a)(4) or group work-hour controls C.2 will be followed.	In addition to the requirements, the procedures must also specify if individual work-hour controls of C.1(a)(4) or group work-hour controls C.2 will be followed.	This is required to determine which option shall be used by a licensee (i.e., individual or group work-hour controls).